REMARKS

Applicants wishes to thank the Examiner for his consideration for an in-person interview and regret that we could not arrange it. Applicants request reconsideration of the rejection and its finality in view of the amendments and comments herein. In the above-identified application, claims 1-47 have been rejected. Upon entry of this Amendment, claims 1, 2, 22, 31, 44 and 45 are amended, and claims 14, 16, 35, and 37 canceled. No new matter has been added.

Specification.

Applicants have amended the Specification in paragraph [0047] to clarify the source of information for the Java 2 Software Developer Kit Standard Edition Documentation, which includes information about the Java programming language (e.g., the Java Language Specification). This amendment adds no matter as Sun Microsystems is specified as the source of the "The Java Language Environment White Paper," which is cited in the same paragraph.

Section 112.

Applicants have amended claims 2, 44, and 45 to recite a language configured to conform to a Java language specification. Language specifications in the software arts are authoritative and definitive sources that can define implementations of executable instructions. In one example, a source of a language specification can be Sun Microsystems, Inc., as disclosed in paragraph 0047. Applicants submit that these claims now particularly point out the subject matter of claims 2, 44, and 45. Thus, Applicants request the withdrawal of the § 112 rejection.

Section 102(b): Kanamori.

Independent claim 1 and dependent claims 3-5, 7-21, and independent claim 22 and dependent claims 24-27, 29-43, 46 and 47 were rejected under 35 U.S.C. §102(b) as being

anticipated by U.S. Patent No. 6,167,565 ("Kanamori"). Applicant respectfully traverses this rejection with respect to amended claims 1 and 22 and the respective dependent claims.

Amended claim 1.

Applicant has amended claim 1 to include elements of claims 14 and 16 and submits that Kanamori does not teach or suggest each of the elements set forth in amended claim 1. For example, consider that amended claim 1 recites "[a] module for selecting the appropriate translator is configured to perform at least a two-level lookup in the translation mapping to select the appropriate translator," and that "at least one level of the two-level lookup includes a lookup of an inheritance hierarchy of the actual type to select the appropriate translator." Kanamori neither teaches nor suggests the above-mentioned elements of amended claim 1.

The Official Action on p. 8 suggests that Table 1 of Kanamori at col. 4, lines 50-65 teaches "selecting the appropriate translator" by performing at least "a two-level lookup," as set for in original claim 14. Applicant respectfully disagrees. Rather, Table 1 of Kanamori discloses mappings between prototypes. See e.g., col. 4 lines 66-67 ("Table 1 illustrates the mapping of the COM prototypes to the Java prototype."). The term "Foo" is used to describe a function to be invoked. See generally, col. 5, lines 6-7. Further, data types JAVATYPE and COMTYPE refer to a type of the Java parameter and a type of the COM parameter, respectively. See generally, col. 5, lines 3-5. Therefore, table 1 appears to describe a mapping for a function (e.g., function Foo) "from a data type (e.g., COMPTYPE) in one programming language to a corresponding data type (e.g., JAVATYPE) in another programming language." Col. 4, lines 4-6. As there appears to be one way of relating a datatype to function in Table 1, Kanamori cannot be said to represent more than performing a one-level lookup. Thus, Kanamori does not appear to teach or suggest "selecting the appropriate translator" by performing at least "a two-level lookup," as set forth in amended claim 1.

There are other differences that further distinguish the claimed invention from the Kanamori. Consider too that claim amended 1 also sets forth "at least one level of the two-level lookup includes a lookup of an inheritance hierarchy of the actual type to select the appropriate translator," which Kanamori neither teaches nor suggests.

Applicants respectfully request withdrawal of the §102(b) rejection in connection with amended claim 1.

Claim 22.

For at least the foregoing reasons set forth in association with amended claim 1, Applicant respectfully submits that independent claim 22 are now in condition for allowance. Therefore, withdrawal of the §103(a) rejection in connection with this claim is respectfully requested.

Dependent 2-21 and 23-47.

Claims 2-21, and 23-47 depend from allowable independent claims 1 and 22, respectively, and are thus patentable for at least the same reasons for claims 1 and 22. Therefore, withdrawal of the §102(b) rejection in connection with these claims is respectfully requested.

Section 103(a): Kanamori in view of Vargas.

Dependent claims 2, 44, and 45 were rejected under 35 U.S.C. §103(a) as being unpatentable by U.S. Patent No. 6,167,565 ("Kanamori") in view of U.S. Patent Pub. No. US2002/0055942 ("Reynolds"), and in further view of U.S. Patent Pub. No. US2004/0103405 ("Vargas"). Claims 2, 44, and 45 depend from allowable independent claims 1 and/or 22, and thus are patentable for at least the same reasons. Therefore, withdrawal of the §103(a) rejection in connection with these claims is respectfully requested.

If the Examiner believes it would be appropriate to discuss the issues to further the prosecution in this case, he is invited to call the undersigned.

Respectfully submitted,

KOKKA & BACKUS, PC

Kenneth R. Backus, Jr.

Reg. No. 48,861

KOKKA & BACKUS, PC 200 Page Mill Road, Suite 103 Palo Alto, CA 94306-2022

Tel: (650) 566-9921 Fax: (650) 566-9922